

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

SAMUEL FORBES,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:16cv943
)	
KARLEIGH, INC. f/k/a)	
VALENTINE & KEBARTAS, INC.,)		
VALENTINE & KEBARTAS, INC., and)	
VALENTINE & KEBARTAS, LLC,)	
)	
Defendants.)	

**DEFENDANT VALENTINE & KEBARTAS, LLC'S
MOTION TO DISMISS FIRST AMENDED COMPLAINT OR
STAY AND COMPEL ARBITRATION OR TRANSFER VENUE**

Defendant Valentine & Kebartas, LLC (the "Defendant" or "V&K, LLC"), by counsel, hereby moves the Court to dismiss Plaintiff Samuel Forbes's ("Plaintiff") First Amended Complaint [ECF No. 4] pursuant to Rules 12(b)(1), 12(b)(3), and 12(b)(6) of the *Federal Rules of Civil Procedure*, or in the alternative, stay the proceedings and compel arbitration, or in the alternative, transfer venue to the Western District, for the reasons set forth in Defendant's accompanying memorandum in support.

Dated: January 23, 2017

Respectfully Submitted,

VALENTINE & KEBARTAS, LLC

By Counsel

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